

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.

AMESBURY PUBLIC SCHOOLS,  
Plaintiff

v.

BUREAU OF SPECIAL EDUCATION  
APPEALS of the MASSACHUSETTS DIVISION  
OF ADMINISTRATIVE LAW APPEALS, and  
JOHN DOE AND JANE DOE,  
Defendants

**PLAINTIFF'S MOTION TO STAY DECISION AND ORDER OF THE  
BUREAU OF SPECIAL EDUCATION APPEALS**

The Plaintiff, the Amesbury Public Schools (hereinafter "Amesbury"), hereby requests a stay of the decision and order of the Bureau of Special Education Appeals that Amesbury reimburse Defendants, John Doe and Jane Doe, the sum of \$68,246.86 for the past unilateral placement of their daughter in a private special education school.

In support of its Motion, Amesbury submits that it would be inequitable to require it to reimburse Defendants prior to a final decision on the merits in this matter, which is pending pursuant to the instant appeal. In further support of this Motion, Amesbury submits a Memorandum of Law.

WHEREFORE, Plaintiff requests that its Motion to Stay be allowed.

Respectfully submitted,

For the Plaintiff,  
AMESBURY PUBLIC SCHOOLS,  
By its attorneys,

  
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**CERTIFICATION**

I hereby certify that a true copy of the above document was served upon the party and/or attorney for each other party by first class mail and email on August 5, 2021.

/Jeffrey M. Sankey/  
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Jeffrey M. Sankey, BBO #551062